

UNITED STATES BANKRUPTCY COURT
EASTERN DISTRICT OF VIRGINIA
(RICHMOND DIVISION)

In re:

CIRCUIT CITY STORES, INC., *et al.*

Debtors.

Case No. 08-35653-KRH
Jointly Administered
Chapter 11 Proceedings

**STATEMENT PURSUANT TO FEDERAL RULE
OF BANKRUPTCY PROCEDURE 2019**

I, Kevin M. Newman, Esq., declare and state as follows:

1. I am an attorney licensed to practice law in the state of New York and am a shareholder of the law firm of Menter, Rudin & Trivelpiece, P.C. ("MRT"). I have personal knowledge of the facts set forth herein and if called as a witness could and would competently testify thereto.

2. I am the attorney primarily responsible for representing the following creditors (collectively referred to as the "Landlords") in connection with the above captioned case:

Carousel Center Company, L.P.
c/o Pyramid Management Group, Inc.
The Clinton Exchange
4 Clinton Square
Syracuse, NY 13202

Sangertown Square, L.L.C.
c/o Pyramid Management Group, Inc.
The Clinton Exchange
4 Clinton Square
Syracuse, NY 13202

EklecCo NewCo, LLC
c/o Pyramid Management Group, Inc.
The Clinton Exchange
4 Clinton Square
Syracuse, NY 13202

Landover (Landover Crossing), LLC
c/o Rivercrest Realty Associates, LLC
8816 Six Forks Road, Suite 201
Raleigh, North Carolina 27615

Charlotte (Archdale) UY, LLC
c/o Rivercrest Realty Associates, LLC
8816 Six Forks Road, Suite 201
Raleigh, North Carolina 27615

Cameron Bayonne, LLC
c/o Cameron Group LLC
6007 Fair Lakes Road, Suite 100
East Syracuse, NY 13057

Fingerlakes Crossing, LLC
c/o Cameron Group LLC
6007 Fair Lakes Road, Suite 100
East Syracuse, NY 13057

3. The Landlords currently hold or will hold unsecured pre-petition claims, unsecured rejection damages claims and/or administrative priority claims for unpaid post-petition rent and other charges. The full amount of each of the Landlords' claims is undetermined at this time.

4. The Landlords have all retained MRT to represent them with respect to their interests in connection with the above captioned case. All parties are aware of and have consented to MRT's joint representation of other shopping center clients in this matter.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Dated: November 12, 2008
Syracuse, New York

MENTER, RUDIN & TRIVELPIECE, P.C.
*Attorneys for Carousel Center Company, L.P.,
Sangertown Square, L.L.C., EklecCo NewCo, LLC,
Landover (Landover Crossing), LLC, Charlotte
(Archdale) UY, LLC, Cameron Bayonne, LLC and
Fingerlakes Crossing, LLC*

By: /s/Kevin M. Newman
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